Public Works Department

February 26, 2015

Sam Unger
Executive Officer
LARWQCB
320 W. 4th St. Suite 200
Los Angeles, CA 90013

Subject: Los Angeles County MS4 Permit – Revised City of West Covina Integrated Monitoring Program

Dear Mr. Unger:

The **City of West Covina Public Works Department** (City) is pleased to submit for your review and approval its Integrated Monitoring Program (IMP). The IMP contains the revisions specified in the Regional Board's IMP review letter to the City dated January 16, 2015. Once the revisions have been approved by Regional Board staff, the City shall incorporate them into a final IMP.

The IMP review letter specifies two substantive elements missing in the City's monitoring program submittal: (1) receiving water monitoring; and (2) non-stormwater outfall based monitoring. These and other requests for IMP changes and corrections are contained in *Enclosure 1, Summary of Comments and Required Revisions* and are highlighted in red type of the revised IMP.

I. Receiving Water Monitoring

As our Coordinated Integrated Monitoring Program indicated, the City chose not to conduct receiving water monitoring because it is a requirement that was and still is under administrative challenge. The City challenged this requirement because it could not see any benefit in it. The City, as mentioned in its Individual Watershed Management Program, has opted for compliance at the outfall. That being the case there should be no need to also perform receiving water monitoring. Further, because discharges during storm events are commingled with other MS4s and other sources, permitted and non-permitted, receiving water monitoring cannot serve as a compliance determinant. And as noted in the City's administrative petition and comments to the State Board, TMDLs and other water quality standards are ambient rather than wet weather standards. In deed, State Board Water Quality Order 2001-15 makes it clear that nothing in state or federal law requires compliance with wet weather water quality standards.

Nevertheless, until this issue resolved, the City will endeavor to comply. The City is located in Reach 3 of the San Gabriel River which receives flow from tributaries Walnut Creek (92%) and Reach 1, San Jose Creek (8%). For receiving water monitoring, the City will use the TMDL receiving water location at Walnut Creek and Puente Avenue. The City will use the grab sampling method for receiving water sampling at the channel overpass because it cannot access Los Angeles County's jurisdictionally permitted area. The City will also include receiving water monitoring above the Los Angeles River Estuary as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL.

II. Non-stormwater Outfall Monitoring

The City also opposed non-stormwater outfall monitoring, which it viewed as unnecessary. The ostensible purpose of non-stormwater outfall monitoring is to determine compliance with TMDLs. However, the illicit connection and discharge detection and elimination program addresses impermissible non-stormwater discharges to the MS4. The purpose of the program is to detect illicit discharges and connections by: (1) prohibiting such discharges; and (2) if prohibition is not feasible, to require the discharger to obtain a discharge permit. By eliminating the discharge, the mechanism for transporting TMDLs and other pollutants collected in the MS4, pollutants are prevented from entering the receiving water. Further, federal regulations do not require non-stormwater outfall monitoring for TMDLs or other constituents. Federal regulations only require field screening for illicit discharges for source identification purposes. In any case, the City will conduct non-stormwater discharge outfall monitoring for TMDL constituents relative to Reach 2 of the Rio Hondo, and Reach 3 of the San Gabriel River.

III. Necessary Revisions

See table I for revisions to the City's IMP specified in *Enclosure 1 – Summary of Necessary Revisions to Draft IMP.*

In closing, should you have any questions, please feel free to call me.

Sincerely,

Ignacio Ochoa, P.E.
Interim Public Works Director/City Engineer

Section One Monitoring and Reporting Program (MRP)

1.0 Summary

The Los Angeles County MS4 permit (Order R4-2012-0175) includes compliance with a Monitoring and Report Program (No. CI-6948), (MRP). The MRP addresses the several types of monitoring required by the permit, including: (1) TMDL monitoring at the outfall and receiving water; (2) municipal action levels (MALs) monitoring at the outfall; (3) monitoring action levels (non-stormwater) at the outfall; (4) new development/re-development effectiveness tracking (limited to observations); (4) compliance with municipal action level (MAL) parameters; (5) regional studies; and (6) toxicity testing. The City intends to meets these requirements through its **Integrated Monitoring Program** (IMP) submittal.

In addition to the above monitoring requirements, the WMP section of the permit the permit also appears to require additional monitoring not referenced in the MRP (VI.C.2.a.i and ii). Essentially, these provisions require monitoring of stormwater discharges against water quality standards that are not TMDLs either contained in the basin plan or based on federal regulations. The purpose of the monitoring is to facilitate an evaluation of the adequacy of control measures in meeting the specified limitations. The problem, however, is that permit under the WMP section does not specify which pollutants and water quality standards must be monitored for or to be met. Discussions with Regional Board staff revealed that the water quality standards are mandated by federal regulations. They can be taken from the previous permit under the previous MS4 permit's MRP under Attachment U, which is referenced herein.

Pollutants subject to monitoring will be loaded into the RAA/Water Quality Model to evaluate to what extend the City is persistently exceeding

TMDLs and other water quality standards and identify BMPs that are necessary to preventing such exceedances.

As is explained in the IMP, there are several provisions of the permit reflected in the MRP and IMP that the City cannot comply with because the City has challenged them in its administrative petition. These include, most notably, non-storm water action levels. The City expects these issues to be resolved though a State Board order which is expected to be issued this summer.

1.1 Integrated Monitoring Program

The City has opted for a **Integrated Monitoring Program** (IMP) to comply with monitoring and SWMP/WMP requirements under the MS4 permit. In accordance with the MRP, the CIMP includes the following elements: (1) receiving water monitoring; (2) storm water outfall based monitoring; (3) non-storm water outfall based monitoring; and new development/re-development effectiveness tracking; (4) compliance with municipal action level (MAL) parameters; and (5) regional studies.

It is important to note that the City has complained in its administrative petition about the permit's excessive monitoring requirements which it argues are arbitrary and capricious and exceed federal stormwater regulations. These include any monitoring activity that is located outside an MS4 (toxicity, wet weather TMDL WLAs, regional studies, toxic investigation evaluation (TIE), etc.); and dry weather monitoring that exceeds for federal regulations (dry weather minimum levels, non-stormwater outfall monitoring, and non-stormwater action levels). In the alternative the City will comply with federal field screening requirements for non-stormwater discharges.

1.2 IMP Requirements

Through the Integrated Monitoring Program (IMP), the City proposes to consolidate applicable monitoring program requirements as specified in attachment E of the MS4, which *provides flexibility to allow Permittees to coordinate monitoring efforts on a watershed or sub-watershed basis to leverage monitoring resources in an effort to increase cost-efficiency and effectiveness and to closely* align monitoring with TMDL monitoring requirements *and Watershed Management Programs*. To that end, the City intends to share costs with the cities of South El Monte and Irwindale to conduct ambient monitoring for Reach 3 of the San Gabriel River. The cities participation in ambient monitoring is voluntary. Though the SWAMP should be responsible for performing ambient monitoring, it is not known when, if ever, it intends to conduct ambient monitoring in these reaches. In the meantime, the City recognizes that the ambient monitoring approach will yield accurate data needed to evaluate the beneficial uses and facilitate compliance with ambient TMDL WLAs and other water quality standards.

The City does not plan to use a collaborative approach pay for monitoring in the receiving water to determine compliance with wet weather TMDLs because TMDLs are ambient not wet weather standards as explained below.

GIS maps has been developed to depict the geographic boundaries of the monitoring plan including the receiving waters, the MS4 catchment drainages and outfalls, sub-watershed boundaries, political boundaries, land use, and the proposed receiving water monitoring stations for both dry weather and wet weather receiving water monitoring. Outfall monitoring points and existing ambient monitoring points are shown on the maps.

Also shown are mass emissions stations and other in-stream monitoring stations. The maps are contained in **Appendix A**.

The City of West Covina is located in the San Gabriel River Watershed Management Area. Table I below summarizes the land use breakdown for the City.

Table I – Land use breakdown

Land Use	Walnut Creek		Puente Creek		Total	
	Acres	Percentage	Acres	Percentage	Acres	Percentage
Residential	4276	41.5%	687.8	6.7%	4963.8	48%
Commercial	1000.3	9.7%	182.3	1.8%	1682.6	16.3%
Industrial	564.6	5.5%	210	2.04%	774.6	7.5%
Vacant	730.4	7.1%	428.5	4.2%	1158.9	11.4%
Transportation	1686.7	16.3%	-	-	1686.7	16.3%
Water	-	-	31.36	0.3%	31.36	0.3%
Total	**8758**	**85%**	**1540**	**15%**	**10298**	**100%**

Table II Land use breakdown within Sub-watershed (HUC 12)

Land Use	Big Dalton Wash	Lower San Jose Creek	Santa Fe Dam Flood Control Basin	Upper San Jose Creek
	Acres	Acres	Acres	Acres
Residential	2219.8	2436	205.3	102.9
Commercial	1108.2	471.4	103	-
Industrial	480.5	294.1	-	-
Vacant	434.6	724.3	-	-
Transportation	1058.4	628.3	-	-
Water	31.36	-	-	-

Total	**5332.8 (51.8%)**	**4554.1 (44.2%)**	**308.3 (2.9%)**	**102.9 (1%)**

1. 3 Receiving Water Monitoring

The MS4 permit requires receiving water monitoring to be performed at in-stream mass emissions stations; additional receiving water compliance points approved by the Regional Board's Executive Officer; and additional locations that are representative of impacts from MS4 discharges. The objectives of receiving water monitoring are: (1) determine if receiving water limitations are being achieved; (2) assess trends in pollutant concentrations over time, or during specified; and (3) determine whether the designated beneficial uses are fully supported based on water chemistry, as aquatic toxicity and bio-assessment monitoring.

The City's receiving water monitoring plan shall be limited to utilizing existing ambient water quality data developed by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP) and data generated by other agencies including, but not limited to, the Council for Watershed Health (CWH) and the Sanitation Districts of Los Angeles County (SDLAC).

The City cannot participate in any receiving water monitoring activity or action that involves any action or activity outside of its MS4. As the City's administrative petition effectively argues, the receiving water is not part of the MS4. The City's responsibility for monitoring ends at the discharge from the outfall before it reaches the receiving water.

The City has also argued in its petition that federal storm water regulations and judicial decisions affirm that MS4 permit compliance with water quality standards (WQS) is determined at the outfall – not in the receiving water. The regulatory "range" of an MS4 permit ends in storm

water discharge from the outfall before it reaches the receiving water. A receiving water, in other words, is not part of the MS4.

It should be noted that the 9th Circuit Court of Appeal in NRDC v. LACFCD made it very clear that the compliance determinant for MS4 discharges is at the outfall – not the receiving water. The 9th Circuit agreed with a lower federal court ruling that held violations cannot be determined in the receiving water because of evidentiary challenges: how can one prove that a permittee caused exceedances in receiving waters, waters which also receive stormwater discharges from other sources? The 9th Circuit also said if a violation is to be determined it must be based on discharges from the outfall.

Further, there is nothing in federal law or USEPA guidance, or state law that authorizes compliance with TMDL WLAs or other water quality standards based on wet weather monitoring of receiving waters. According to State Water Quality Order 2001-0015: *There is no provision in state or federal law that mandates the adoption of separate water quality standards for wet weather conditions.* TMDLS/Water quality standards are not and cannot be wet weather standards -- they are ambient (dry weather) standards. It should be obvious that sampling a wet weather discharge from a receiving water (not be confused with an outfall), against an ambient standard is unrealistic and serves no purpose.

There is also no benefit to performing receiving water monitoring to determine compliance with wet weather TMDL WLAs or to assess the health of the receiving water. Pollutants during a storm event emanate from a variety sources including, but not limited to: permitted facilities such as industrial and construction sites; various municipal point sources; non-municipal point sources (e.g., sewage treatment plans) and non-point sources including atmospheric deposition. It would be impossible to

determine which of these dischargers was responsible for exceeding a wet weather WLA, which again is not legally valid in any case. It should be clear that monitoring during a significant storm event would be of no value in assessing the health of the receiving water. In fact, it is the worse time to monitor. The City will, nevertheless, rely on in-stream ambient monitoring to assess the impact of the SWMP/WMP on the beneficial uses of the receiving waters into which it discharges in accordance with the schedule referenced below in Section 1.10.

The City of West Covina is located in the San Gabriel River Watershed. It primarily (92%) drains into Walnut Creek with a relatively small portion (8%) of the City draining to Reach 1 of the San Jose Creek. Both the San Jose Creek and Walnut Creek are tributary to Reach 3 of the San Gabriel River which eventually flows into the Pacific Ocean at Seal Beach. For receiving Water monitoring, the City will use the TMDL receiving water location at Walnut Creek and Puente Avenue. The City will use the grab sampling method for receiving water sampling at the channel overpass because it cannot access Los Angeles County's jurisdictionally permitted area.

The City will also include receiving water monitoring above the Los Angeles River Estuary as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL.

The table below summarizes each monitoring location. A GIS map of receiving water location is provided in Attachment A.

Table III– Receiving Water Monitoring Location

Water Body	Waterbody Location	Coordinates	
		Latitude	Longitude
Walnut Creek	Puente Ave & Walnut Creek	34.067233	-117.965043
DC and LA & LB	LAR Estuary	33.772925	-118.2034833

Harbor			
DC and LA & LB Harbor	Mouth of SGR (2nd street &SGR)	33.791567	-118.230747

1.4 Storm Water Outfall-Based Monitoring

The City is committed to stormwater monitoring at the outfall in accordance with federal stormwater regulations. Outfall monitoring will be limited to: (1) aiding in determining compliance with WQBELs (TMDL WLAs and other water quality standards measured against ambient standards); and (2) evaluating stormwater discharges against Municipal Action Levels (MALs). Outfall monitoring, however, cannot determine compliance with wet weather TMDL WLAs in the receiving water. Once again, there is no support for the legitimate existence of a wet weather TMDL or any water quality standard. Further, the purpose of the MALs is unclear and appears to be superfluous. However, the City would be willing to comply with MAL monitoring if offered as alternative to conventional monitoring for compliance purposes.

It should be noted that the outfalls are not actual monitoring locations from which samples can be taken because they are located within LACFCD property which is not accessible to the City. Instead, the City has identified the storm drain manhole points nearest to the outfall(s).

These are referred to in federal stormwater regulations as “field screening” points. Their locations indicate a mix of industrial, commercial, and residential uses and, therefore, are representative. Stormwater discharges from the outfall sampling points will be measured against ambient TMDL standards. The ambient standard is one that is required to assure that beneficial uses of receiving waters are protected against impairment. Sampling results will be reported to the Regional Board

annually. If persistent exceedances of the ambient standards are detected, the iterative process will be triggered.

The City plans to conduct stormwater outfall monitoring three times a year, during the wet season (October 1 through May 15), with at least one month in between in accordance with 40 CFR §122.21(g)(7). Each of the outfalls is representative to the extent it includes drainage areas from a mix of land uses. One outfall from each reach will be sampled (one for Walnut Creek and one for San Jose Creek of the San Gabriel River) each year over the term of the permit in an alternating manner. At the end of the 5 year term of the permit the City will be able to evaluate persistent exceedances of TMDLs and other water quality standards and propose adjustments to BMPs and other actions in the Report of Waste Discharge (ROWD), the MS4 permit reapplication that is due to the Regional Board 180 days prior to the expiration of the current permit (May of 2017).

Although the City will use the data to determine compliance with WQBELs, expressed as ambient TMDL WLAs, and to measure stormwater discharges against municipal action levels (MALs), it cannot sanction the use of the data to determine compliance with TMDL WLAs in the receiving water. As mentioned, the City is not responsible for conducting any monitoring or any activity outside the realm of its MS4. Further, as also mentioned, the City cannot measure stormwater discharges from the outfall against wet weather standards because they are not legally valid.

Table IV – Land Use Breakdown – Monitoring Locations

Land Use Type	Drainage Area (Acres & Percentage)			
	M1	M2	M3	M4
Residential	1398.9	1010.5	1787.4	767
Commercial	236.8	483.1	703.7	259
Industrial	118	255.6	501	-

Vacant	-	-	298.2	857.9
Transportation	823.8	-	862.9	-
Total	**2577.5 (25%)**	**1750.2 (18%)**	**4174 (39.3%)**	**1884 (18.3%)**

Table V – Inventory of Outfall Location

ID No.	Outfall Coordinates	Outfall Location	Ownership	Size (in)	Outfall material	Picture
WCR 025	34.6514167; -117.9590917	S. Willow Ave.	LACFCD	78	Reinforced Concrete Box (RCB)	
WCR 030	34.0648222, -117.949686	S. Orange Grove	LACFCD	90	Reinforced Concrete Box (RCB)	
WCR 029	34.06493056; -117.9521389	W. Merced Ave.	LACFCD	96	Reinforced Concrete Box (RCB)	
WCR 047	34.0658111; -117.9165028	S. Lark Ellen Ave.	LACFCD	60	Reinforced Concrete Pipe (RCP)	
WCR 035	34.06811111; -117.938761	S. Sunset Ave.	LACFCD	75	Reinforced Cement Concrete (RCC)	
WCR 050B	34.06899167, -117.8900833	E. Cortez St	LACFCD	90	Reinforced Concrete Pipe (RCP)	
WCR 061	34.06904167; -117.8901194	S. Citrus St.	LACFCD	114	Reinforced Concrete Box (RCB)	
WCR 066	34.07115556; -117.8811111	S. Barranca Ave.	LACFCD	54	Reinforced Cement Concrete (RCC)	
PUENT CR 100B	34.0444222; -117.9126639	S. Azusa Ave	LACFCD	60	Reinforced Concrete Pipe (RCP)	

Table VI – Monitoring Location of Field Screening Points

ID No.	Field Screening Coordinates	Field Screening Location	Ownership	Size (in)	Field Screening material	Picture
1	34.06455278; -117.9512972	S. Orange Ave.	LACFCD	36	Manhole Pipe to Pipe Main Line	
2	34.06414; -117.9499556	W. Merced Ave.	LACFCD	36	Manhole – Concrete Box Storm Drain	
3	34.065039; -117.907700	S. Azusa Ave	LACFCD	36	Manhole – Concrete Box Storm Drain	
4	34.0485185; -117.9193662	E. Amar Rd & S. Azusa Ave.	LACFCD	36	Manhole – Concrete Box Storm Drain	

1.5 Non-Storm Water Outfall-Based Monitoring

The City will not perform non-stormwater outfall monitoring to determine compliance with TMDLs, other water quality standards, and action levels. Such requirements exceed federal stormwater regulations. As already explained, MS4 permittees are required to control pollutants in stormwater discharges from the outfall through BMPs and other actions. For non-stormwater discharges no such requirement is mandated. MS4 permittees are required only to prohibit impermissible (i.e., non-exempt) non-stormwater discharges into the MS4. If a permittee does not succeed in getting the discharger to prohibit the non-stormwater discharge it must require the discharger to obtain a separate discharge permit. This is an argument that was raised in the City's administrative petition and is supported by federal statute and State Board water quality orders.

As per the Los Angeles County MS4 Permit, non-stormwater outfall based monitoring must be included in the IMP as outlined in Part IX of

Attachment E. The City's non-stormwater outfall based screening and monitoring process are outlined below:

- **Field Screening**: Outfalls greater than or equal to 36 inches in diameter will be located and mapped using GIS. Outfalls will be monitored two additional times, after a 72 hour rain event. Observations will be conducted during working hours. During observations staff will complete an **Outfall Screening Form** containing information such as date, time, weather, flow amount, visual turbidity, trash, and odor. Photographs will also be taken during inspections.
- **Inventory of Screening Points**: An inventory will be developed for major MS4 outfalls with known significant non-stormwater discharges and those requiring no further assessment.
- **No further Assessment**: No further Assessment will be reported in the inventory database if no flow is observed on at least 4 out of 5 visits.
- **Prioritization Criteria & Source Investigation**: Based on data collected during the screening process, the City will identify screening points with significant non-stormwater discharges and those requiring no further action. The data collected as part of the outfall screening process will be used to prioritize outfalls for source investigation. The City will complete 25% of source identification inventory by December 28, 2015 and 100% by December 28, 2017.
- **Implement Source Identification**: If necessary, the City will implement source identification in prioritized order, consistent with the City's IC/ID Program. The City's contribution will be quantified if the discharge is comprised of multiple sources. Upstream jurisdictions and the Regional Board will be notified if the source originates outside the City's jurisdiction.

- **Monitoring Non-storm Water Discharge Exceedance Criteria**: The City will monitor outfall screening points conveying significant discharges comprised of unknown or conditionally exempt non-stormwater discharges, or continuing illicit discharges. In addition, an outfall subject to an approved dry weather TMDL will be monitored per the TMDL monitoring plan. Monitoring frequency will be reduced to twice per year beginning the second year of monitoring provided that pollutant concentrations during the first year do not exceed WQBELs or water quality standards on the 303(d) list for the receiving water. Outfall(s) will be monitored for flow and constituents identified in Attachment N of MS4 permit, and other pollutants identified on the 303(d) list. Pollutants identified in a TIE conducted in response to observed aquatic toxicity during dry weather at the nearest downstream receiving water monitoring station. If the discharge exhibits acute toxicity, then a TIE shall be conducted. The following parameters shall be monitored:
  - Flow
  - Pollutants assigned a WQBEL or RWL to implement TMDL Provisions applicable to the receiving waterbody
  - Other Pollutants identified on the CWA 303(d) list for receiving water
  - Pollutants identified in a TIE conducted in response to observed aquatic toxicity during dry weather at the nearest downstream receiving water monitoring station during the last sample event or, where the TIE conducted on the receiving water sample was inconclusive. If the discharge exhibits aquatic toxicity, then a TIE shall be conducted.
  - Other parameters in Table E - 2 identified as exceeding the lowest applicable water quality objective in the nearest downstream

receiving water monitoring station per Part VI.D.1.d. of the MS4 Permit.

However, the City will perform outfall visual and sampling monitoring in connection with illicit connection and discharge elimination requirements in keeping with federal stormwater regulations and USEPA guidance. Non-stormwater discharge monitoring will conform to 122.26(d)(1)(D) for the purpose of screening for illicit connections and dumping, which specifies visual monitoring at outfalls for dry weather (non-stormwater discharges). Visual monitoring shall be performed twice a year during dry periods. If flow is observed samples for the outfall (or field screening points):

> *...samples shall be collected during a 24 hour period with a minimum period of four hours between samples. For all such samples, a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum as well as any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be provided.*

In addition, regulations require a narrative description of the results from sampling for fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides and potassium; pH, total chlorine, total copper, total phenol, and detergents (or surfactants) shall be provided along with a description of the flow rate. These analytes will be used as potential indicators of illicit discharges, which would trigger an up-stream investigation to identify the source of the suspected illicit discharge or connection. If the source of the illicit discharge/connection and discharger is identified the City shall notify the discharger that it will need to halt the discharge and, if not feasible, will require the discharger to obtain a discharge permit.

1.6 Municipal Action Levels

The purpose of municipal action levels (MALs) is not clear and appears to superfluous given the permit's other monitoring requirements. All of the MAL constituents are already addressed by TMDLs and federally mandated monitoring for certain constituents[1]. The MS4 permit's fact sheet mentions that the purpose of MAL monitoring is to evaluate the effectiveness of a Permittee's stormwater management program in reducing pollutant loads from drainage areas as a means of determining compliance with the maximum extent practical (MEP) standard. It is also intended to evaluate the effectiveness of post-construction BMPs. The permit, however, does not explain how MAL monitoring will accomplish those ends. Further, it is not clear how MALs can evaluate post-construction BMPs. One basic question is where would MAL monitoring be performed: at the development or new development site, for which post-construction BMPs have been prescribed, or down stream from it?

The City has challenged the MAL monitoring requirement in its administrative petition, based on these and other concerns. MAL monitoring represents an unnecessary cost that accomplishes nothing beneficial. Nevertheless, because MAL constituents are included in other stormwater monitoring requirements, the City will effectively be meeting this requirement. The permit's monitoring program also requires non-stormwater MAL compliance. As mentioned, the City has challenged all non-stormwater monitoring tasks that are intended to determine compliance with TMDLs and other water quality standards.

[1]Total nitrogen, total phosphorous, Ammonia N, TKN, Total PCBs, Chlordane, Dieldrin, 4,4 – DDD, 4,4 – DDE, 4,4 – DDT, Cadmium, Chromium, copper, lead, zinc, E-Coli, fecal coliform.

1.7 New Development/Redevelopment Tracking

The PLDP requires tracking new development and redevelopment projects within 60 days after the permit's adoption (unless a permittee chooses to participate in watershed management program). Although not a monitoring requirement per se, permittees are nevertheless required to maintain a database containing the following information:

- name of the project and developer,
- project location and map (preferably linked to the GIS storm drain map),
- date of Certificate of Occupancy,
- 85th percentile storm event for the project design (inches per 24 hours),
- 95th percentile storm event for projects draining to natural water bodies
- (inches per 24 hours), related to hydromodification
- other design criteria required to meet hydromodification requirements for drainages to natural water bodies,
- project design storm (inches per 24-hours),
- project design storm volume (gallons or MGD),
- percent of design storm volume to be retained on site
- design volume for water quality mitigation treatment BMPs, if any.
- if flow-through, water quality treatment BMPs are approved, provide the one year, one-hour storm intensity as depicted on the most recently issued isohyetal map published by the Los Angeles County Hydrologist,
- percent of design storm volume to be infiltrated at an off-site mitigation or groundwater replenishment project site
- percent of design storm volume to be retained or treated with bio-filtration at an off-site retrofit project,
- location and maps (preferably linked to the GIS storm drain map required in Part VII.A of this MRP) of off-site mitigation, groundwater replenishment, or retrofit sites documentation of issuance of requirements to the developer.

The City intends to meet this requirement through a revised SUSMP evaluation form.

1.8 Regional/Special Studies

The Southern California Stormwater Monitoring Coalition (SMC) Regional Watershed Monitoring Program was initiated in 2008. This program is conducted in collaboration with the Southern California Coastal Water Research Project (SCCWRP), State Water Board's Surface Water Ambient Monitoring Program, three Southern California Regional Water Quality Control Boards (Los Angeles, Santa Ana, and San Diego) and several county storm water agencies (Los Angeles, Ventura, Orange, Riverside, San Bernardino and San Diego). SCCWRP acts as the facilitator to organize the program and completes data analysis and report preparation. The SMC monitoring program seeks to coordinate and leverage existing monitoring efforts to produce regional estimates of condition, improve data comparability and quality assurance, and maximize data availability, while conserving monitoring expenditures. The primary goal of this program is to implement an ongoing, large - scale regional monitoring program for southern California's coastal streams and rivers. The monitoring program addresses three main questions:

- What is the condition of streams in southern California?
- What are the stressors that affect stream condition?; and
- Are conditions getting better or worse?

In order to continue the implementation efforts of the SMC monitoring program, the City will support or provide monitoring data as described at the SMC sites within the watershed management area(s) that overlap with the City's jurisdictional area.

1.9 Toxicity Monitoring

The MRP of the MS4 permit requires toxicity testing at the outfall and in the receiving water. The City will collect and analyze grab samples taken from receiving water monitoring locations to evaluate the extent and cause of toxicity in the receiving water. If toxicity is present in the receiving water the City will perform toxicity testing on water samples taken from field screening points to make sure that the toxicity is coming from City's jurisdictional area. A sufficient number of samples specified in the MRP shall be collected to perform both the required toxicity test and TIE studies.

1.9.1 Sensitive Spices Selection

The MRP states that a sensitivity screening is required to select the most sensitive test species unless "a sensitive test species has already been determined, or if there is prior knowledge of potential toxicant(s) and a test species is sensitive to such toxicant(s), then monitoring shall be conducted using only that test species." Previous relevant studies conducted in the watershed should be considered. Such studies may have been completed via previous MS4 sampling, wastewater NPDES sampling, or special studies conducted within the watershed. The following sub-sections discuss the species section process for assessing aquatic toxicity in receiving waters.

1.9.2 Freshwater Sensitive Spices Selection

As described in the MRP, if samples are collected in receiving waters with salinity less than 1 part per thousand (ppt), or from outfalls discharging to receiving waters with salinity less than 1 ppt, toxicity tests should be conducted on the most sensitive test species in accordance with species and short-term test methods in *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms.* The freshwater test species identified in the MRP are:

- A static renewal toxicity test with the fathead minnow, Pimephales promelas (Larval Survival and Growth Test Method 1000.04).

- A static renewal toxicity test with the daphnid, Ceriodaphnia dubia (Survival and Reproduction Test Method 1002.05).

- A static non-renewal toxicity test with the green alga, Selenastrum capricornutum (also named Raphidocelis subcapitata) (Growth Test Method 1003.0).

The three test species were evaluated to determine if either a sensitive test species had already been established or, if there is prior knowledge of potential toxicant(s), to determine if a test species is sensitive to such toxicant(s). In reviewing the available data in the Dominguez Channel watershed, metals, historical organics, and pyrethroids have been identified as problematic and are generally considered the primary aquatic life toxicants of concern found in urban runoff. Given the knowledge of the presence of these potential toxicants in the watershed, the sensitivities of each of the three species were considered to evaluate which is the most sensitive to the potential toxicants in the watersheds.

As C. dubia is identified as the most sensitive to known potential toxicant(s) typically found in receiving waters and urban runoff in the freshwater potions of the watershed, C. dubia is selected as the most sensitive species. This species also has the advantage of being easily maintained by means of in-house mass cultures. The simplicity of the test, the ease of interpreting results, and the smaller volume necessary to run the test, make the test a valuable screening tool. The ease of sample collection and higher sensitivity will support assessing the presence of ambient receiving water toxicity or long term effects of toxic storm water over time.

As such, toxicity testing in the freshwater portions of the watershed will be conducted using C. dubia. However, C. dubia test organisms are typically cultured in moderately hard waters and can have increased sensitivity to

elevated water hardness greater than 400 mg/L CaCO3, which is beyond their typical habitat range. Because of this, in instances where hardness in site waters exceeds 400 mg/L (CaCO3), an alternative test species may be used. Daphnia magna is more tolerant to high hardness levels and is a suitable substitution for C. dubia in these instances.

1.9.3 **Toxicity Identification Evaluation (TIE)**

A toxicity test sample is immediately subject to TIE procedures to identify the toxic chemical(s), if either the survival or sub-lethal endpoint demonstrates a Percent Effect value equal to or greater than 50% at the IWC. Percent Effect is defined as the effect value denoted as the difference between the mean control response and the mean IWC response, divided by the mean control response, multiplied by 100. A TIE shall be performed to identify the causes of toxicity using the same species and test method and, as guidance, U.S. EPA manuals: Toxicity Identification Evaluation: Characterization of Chronically Toxic Effluents, Phase I (EPA/600/6 - 91/005F, 1992); Methods for Aquatic Toxicity Identification *Evaluations, Phase II* Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R - 92/081, 1993); and Marine Toxicity Identification Evaluation (TIE): Phase I Guidance Document (EPA/600/R - 96 - 054, 1996).

The TIE should be conducted on the test species demonstrating the most sensitive toxicity response at a sampling station. A TIE may be conducted on a different test species demonstrating a toxicity response with the caveat that once the toxicant(s) are identified, the most sensitive test species triggering the TIE shall be further tested to verify that the toxicant has been identified and addressed. A TIE Prioritization Metric (see Appendix 5 in SMC Model Monitoring Program) may be utilized to rank sites for TIEs.

1.9.4 **Toxicity Reduction Evaluation (TRE)**

When a toxicant or class of toxicants is identified through a TIE conducted at a receiving water monitoring station, the City shall analyze for the toxicant(s) during the next scheduled sampling event in the discharge from the outfall(s) upstream of the receiving water location. If the toxicant is present in the discharge from the outfall, at levels above the applicable receiving water limitation, a TRE shall be performed for that toxicant. The TRE shall include all reasonable steps to identify the source(s) of toxicity and discuss appropriate BMPs are identified; the City shall submit a TRE Corrective Action Plan to the Regional Water Board Executive Officer for approval. At a minimum, the plan shall include a discussion of the following:

- The potential sources of pollutant(s) causing toxicity.
- A list of municipalities and agencies that may have jurisdiction over sources of pollutant(s) causing toxicity.
- Recommended BMPs to reduce the pollutants(s) causing toxicity.
- Proposed post - construction control measures to reduce the pollutant(s) causing toxicity.
- Follow - up monitoring to demonstrate that the toxicants have been reduced or eliminated.

1.10 Chemical TMDL Monitoring

Chemical TMDL sampling will be performed at field screening points for stormwater discharges at least three times a year in accordance with the MRP. Sampling and analysis will be in keeping with USEPA guidance. The tables below specify each TMDL WLA to which the City is subject.

Table VII - San Gabriel River Watershed TMDLs

Wet Weather WLA

Water Body	Copper	Lead	Zinc
San Gabriel River Reach 2[2]	N/A	81.34 mg/l x daily storm volume (L)	N/A

Dry Weather			
Water Body	**Copper**	**Selenium**	**Lead**
San Jose Creek Reach 1	NA	5 mg/l	N/A

1.11 TMDL Compliance Schedule

Tables III below show the following compliance deadlines for interim and final TMDL waste load allocations (WLAs) for the metals and selenium TMDL for the San Gabriel River.

Table VIII - San Gabriel River Metals and Selenium TMDL

TMDL Pollutant	Target	Interim WLA
All Metals	• 30% of the total drainage area meeting dry-weather WLAs & 10% meeting the wet-weather WLAs	September 30, 2017
	• 70% of the total drainage area meeting dry-weather WLAs & 35% meeting the wet-weather WLAs	September 30, 2020
TMDL Pollutant	**Target**	**Final WLA**
All Metals	• 100% of the total drainage area meeting dry-weather WLAs & 65% meeting the wet-weather WLAs	September 30, 2026

1.12 MAL Monitoring

Stormwater sampling against MAL analytes shall be performed at the same time stormwater monitoring is performed for other purposes and with the same frequency – three times during the wet season. The table below identifies the MAL analytes and their numeric limitations.

[2]The city drains into San Jose Creek Reach 1 & Walnut Creek, which is upstream of SGR Reach 2;therefore, the wet weather WLA for Lead for SGR Reach 2 applies

Table IX - Municipal Action Levels

Metals	Unit	Total
Cadmium	ug/l	2.52
Chromium	ug/l	20.2
Copper	ug/l	71.12
Lead	ug/l	102
Zinc	ug/l	641.3
Nickel	ug/l	27.43
Conventional Pollutants	**Unit**	**MAL**
Total Phosphorus	mg/l	0.80
Nitrate & Nitrite	mg/l	1.85
Kjedahl Nitrogen (TKN)	mg/l	4.59
COD	mg/l	247.5
TSS	mg/l	264.1
pH	-	6 -9

1.13 Action Level Monitoring

The tables below lists non-stormwater action level analytes for the Los Angeles River and San Gabriel River. As mentioned, the City does not intend to conduct action level or any other non-stormwater monitoring at the outfall. Such monitoring is not authorized under the Clean Water Act and is contrary to State Board water quality orders. Because non-stormwater discharges are not subject to an iterative process, an exceedance would place a permittee in violation. And, in the case of Reach 2 of the Rio Hondo, non-stormwater outfall sampling is physically impossible because outfalls are covered with heavy metallic flap gates that prevent non-stormwater from leaving the storm drain and entering the river. Further, these structural controls prevent pollutants in non-stormwater runoff from entering the river. Nevertheless, the City shall conduct non-stormwater monitoring to detect and eliminated illicit discharges and connections (see below Section 1.14).

Table X - Non-stormwater Action Levels San Gabriel River

Analyte	Units	Average Monthly	Daily Maximum
pH	Standard Units	6.0 – 9.0[1]	
Total Coliform bacteria	#/100 ml	1000[2,3]	10,000[3,4]
Fecal Coliform Bacteria	#/100 ml	200[2]	400[4]
Enterococcus Bacteria	#/100 ml	35[2]	104[4]
Chloride	mg/l	180	--
Nitrite Nitrogen. Total (as N)	mg/l	8	--
Sulfate	mg/l	300	--
TDS	mg/l	750	--
Aluminum, Total Recoverable	mg/l	1.0[6]	--
Cyanide, Total Recoverable	µg/L	0.5	1
Cadmium, Total Recoverable	µg/L	7.7	15
Copper, Total Recoverable	µg/L	2.9	5.8
Lead, Total Recoverable	µg/L	7	14
Selenium, Total Recoverable	µg/L	58	117
Nickel, Total Recoverable	µg/L	6.8	14
Silver, Total Recoverable	µg/L	1.1	2.2
Zinc, Total Recoverable	µg/L	47	95

[1] Within the range of 6 to 9 at all times.
[2] Total coliform density shall not exceed a geometric mean of 1,000/100 ml. Fecal coliform density shall not exceed a geometric mean of 200/100 ml. Enterococcus density shall not exceed a geometric mean of 35/100 ml.
[3] In areas where shellfish may be harvested for human consumption, as determined by the Regional Water Board, the median total coliform density shall not exceed 70/100 ml and not more than 10 percent of the samples shall exceed 230/100 ml.
[4] Total coliform density in a single sample shall not exceed 10,000/100 ml. Fecal coliform density in a single sample shall not exceed 400/100 ml. Enterococcus density shall not exceed a geometric mean of 104/100 ml.
[5] Applicable only to discharges to receiving waters or receiving waters with underlying groundwater designated for Municipal and Domestic Supply (MUN) use as specified in Tables 2-1 and 2-2 of the Basin Plan.

1.14 Additional Monitoring Required for WMP Compliance

MRP section VI.C.2.a.i and ii requires additional outfall monitoring tasks for permittees that opt for the WMP. They include pollutants that are currently not TMDLs but are nevertheless 303(d) listed. Regional Board staff has suggested that other water quality standards be included that can found in the previous MS4 in attachment U of the Monitoring Program.

The purpose of this monitoring task is to identify non-TMDL pollutants are causing impairments to beneficial uses of receiving waters and to evaluate the effectiveness of BMPs implemented through the SWMP/WMP. They are also included to determine if non-TMDL pollutants are causing or contributing to exceedances of receiving water limitations.

The City takes the position that the detection of an exceedance does not constitute a violation. Any persistent exceedance of a TMDL or water quality standard monitored over the term of the permit would not constitute a violation provided that (1) the SWMP/WMP is being implemented in a timely and complete manner; and (2) complies with the iterative process described in MS4 permit section V.A.1-4.

Resulting data generated from WMP-related monitoring will be, along with TMDL monitoring, loaded into the water quality model. These pollutants will be added to the stormwater outfall sampling list.

Table XI - WMP Monitoring for Non-TMDL Water Quality Standards

CONSTITUENTS	USEPA METHOD	MLs
CONVENTIONAL POLLUTANTS		**mg/L**
Oil and Grease	EPA 1664	5
Total Phenols	EPA 420.1	0.1
Cyanide	EPA 4500-CNC	0.005
pH	EPA 150.1	0 – 14
Temperature	NA	None
Dissolved Oxygen	NA	Sensitivity to 5 mg/L
BACTERIA		MPN/100ml
Total Coliform	SM 9221B	<20mpn/100ml
Fecal Coliform	SM 9222 B	<20mpn/100ml
Enterococcus	SM 9230 B	<20mpn/100ml
GENERAL		**mg/L**
Dissolved Phosphorus	SM 4500-PC	0.05
Total Phosphorus	SM 4500-PC	0.05
Turbidity	EPA 180.1	0.1NTU
Total Suspended Solids	EPA 160.2	2
Total Dissolved Solids	EPA 160.1	2
Volatile Suspended Solids	EPA 160.4	2
Total Organic Carbon	SM 5310 B	1
Total Petroleum Hydrocarbon	EPA 1664	5
Biochemical Oxygen Demand	SMOL-5210	2
Chemical Oxygen Demand	SM 5220D	20-900
Total Ammonia-Nitrogen	EPA 350.2	0.1
Total Kjeldahl Nitrogen	EPA 351.2	0.1
Nitrate-Nitrite	EPA 4110	0.1
Alkalinity	EPA 310.1	2
Specific Conductance	EPA 120.1	1umho/cm

Total Hardness	EPA 130.2	2
MBAS	SM 5540 C	<0.5
Chloride	EPA 300	2
Fluoride	EPA 300	0.1
Methyl tertiary butyl ether (MTBE)	EPA 4110	1
Perchlorate	EPA 314.0	4 ug/l
METALS(Dissolved & Total)		**µg/L**
Aluminum	EPA 200.8	100
Antimony	EPA 200.8	0.5
Arsenic	EPA 200.8	1
Beryllium	EPA 200.8	0.5
Cadmium	EPA 200.8	0.25
Chromium (total)	EPA 200.8	0.5
Chromium (Hexavalent)	EPA 200.8	5
Copper	EPA 200.8	0.5
Iron	EPA 200.8	100
Lead	EPA 200.8	0.5
Mercury	EPA 1631	0.5
Nickel	EPA 200.8	1
Selenium	EPA 200.8	1
Silver	EPA 200.8	0.25
Thallium	EPA 200.8	1
zinc	EPA 200.8	1
SEMIVOLATILE ORGANIC COMPOUNDS		
ACIDS		**µg/L**
2-Chlorophenol	EPA 625	2
4-Chloro-3-methylphenol	EPA 625	1
2,4-Dichlorophenol	EPA 625	1
2,4-Dimethylphenol	EPA 625	2
2,4-Dinitrophenol	EPA 625	5
2-Nitrophenol	EPA 625	10
4-Nitrophenol	EPA 625	5
Pentachlorophenol	EPA 625	2
Phenol	EPA 625	1
2,4,6-Trichlorophenol	EPA 625	10
BASE/NEUTRAL		**µg/L**
Acenaphthene	EPA 625	1
Acenaphthylene	EPA 625	2
Anthracene	EPA 625	2
Benzedine	EPA 625	5
1,2 Benzanthracene	EPA 625	5
Benzo(a)pyrene	EPA 625	2
Benzo(g,h,i)perylene	EPA 625	5
3,4 Benzoflouranthene	EPA 625	10
Bis(2-Chloroethoxy) methane	EPA 625	2
Bis(2-Chloroisoproply) ether	EPA 625	5
Bis(2-Chloroethyl) ether	EPA 625	2

Bis(2-Ethylhexl) phthalate	EPA 625	1
4-Bromophenyl Phenyl ether	EPA 625	5
Butyl benzyl phthalate	EPA 625	5
2-Chloroethyl vinyl ether	EPA 625	10
2-Chloronaphthalene	EPA 625	1
4-Chlorophenyl phenyl ether	EPA 625	10
Chrysene	EPA 625	5
Dibenzo(a,h)anthracene	EPA 625	5
1,3-Dichlorobenzene	EPA 625	0.1
1,4-Dichlorobenzene	EPA 625	1
1,2-Dichlorobenzene	EPA 625	1
3,3-Dichlorobenzidine	EPA 625	1
Diethyl phthalate	EPA 625	5
Dimethyl phthalate	EPA 625	2
di-n-Butyl phthalate	EPA 625	2
2,4-Dinitrotoluene	EPA 625	10
2,6-Dinitrotoluene	EPA 625	5
4,6 Dinitro-2-methylphenol	EPA 625	5
1,2-Diphenylhydrazine	EPA 625	5
di-n-Octyl phthalate	EPA 625	1
Fluoranthene	EPA 625	10
Fluorene	EPA 625	0.05
Hexachlorobenzene	EPA 625	0.1
Hexachlorobutadiene	EPA 625	1
Hexachloro-cyclopentadiene	EPA 625	5
Hexachloroethane	EPA 625	1
Indeno(1,2,3-cd)pyrene	EPA 625	0.05
Isophorone	EPA 625	1
Naphthalene	EPA 625	1
Nitrobenzene	EPA 625	0.2
N-Nitroso-dimethyl amine	EPA 625	5
N-Nitroso-diphenyl amine	EPA 625	1
N-Nitroso-di-n-propyl amine	EPA 625	5
Phenanthrene	EPA 625	0.05
Pyrene	EPA 625	0.05
1,2,4-Trichlorobenzene	EPA 625	1
CHLORINATED PESTICIDES		**µg/L**
Aldrin	EPA 608	0.005
alpha-BHC	EPA 608	0.01
beta-BHC	EPA 608	0.005
delta-BHC	EPA 608	0.005
gamma-BHC (lindane)	EPA 608	0.02
alpha-chlordane	EPA 8270	0.1
gamma-chlordane	EPA 8270	0.1
4,4'-DDD	EPA 8270	0.05
4,4'-DDE	EPA 8270	0.05
4,4'-DDT	EPA 8270	0.01

Dieldrin	EPA 608	0.01
alpha-Endosulfan	EPA 608	0.02
beta-Endosulfan	EPA 608	0.01
Endosulfan sulfate	EPA 608	0.05
Endrin	EPA 608	0.01
Endrin aldehyde	EPA 608	0.01
Heptachlor	EPA 608	0.01
Heptachlor epoxide	EPA 608	0.01
Toxaphene	EPA 608	0.5
POLYCHLORINATED BIPHENYLS		**µg/L**
Aroclor-1016	EPA 608	0.5
Aroclor-1221	EPA 608	0.5
Aroclor-1232	EPA 608	0.5
Aroclor-1242	EPA 608	0.5
Aroclor-1248	EPA 608	0.5
Aroclor-1254	EPA 608	0.5
Aroclor-1260	EPA 608	0.5
Congeners3	EPA 8270C	NA
ORGANOPHOSPHATE PESTICIDES		**µg/L**
Atrazine	EPA 8141A/B	2
Chlorpyrifos	EPA 8141A/B	0.05
Cyanazine	EPA 8141A/B	2
Diazinon	EPA 8141A/B	0.01
Malathion	EPA 8141A/B	1
Prometryn	EPA 8141A/B	2
Simazine	EPA 8141A/B	2
HERBICIDES		**µg/L**
2,4-D	EPA 8151A	10
Glyphosate	EPA 8151A	5
2,4,5-TP-SILVEX	EPA 8151A	0.5
SOLIDS		**mg/L**
Total Suspended Solids (TSS)	SM 2540D	2
Suspended Sediment Concentration (SSC)	ASTM D3977-97C	NA
Volatile Suspended Solids	EPA 1684	2

1.15 Non-stormwater Monitoring for ICID-DE

As mentioned above, the City proposes to perform non-stormwater monitoring to detect and eliminate illicit connections and discharges in accordance with 40 CFR 122.26. Monitoring will consist of dry weather visual observations at outfalls or field screening points that shall be conducted monthly during the dry season (May 1 to September 30). If flow

is detected, grab samples are to be taken within a 24 hour period and measured against fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides, and potassium. Other constituents may be added later based on USEPA's ICID-DE guidance manual.

1.16 Reporting Requirements

The City shall comply with all reporting requirements specified in the MRP. Currently TMDL reports for trash, nutrients, and TMDL constituents are reported with the MS4 permit annual report, which is due in December of each year. The City cannot begin to report monitoring results until: (1) the WMP and MRP has been approved by the Regional Board, (expected to happen 4 months after the June 28th WMP submittal date); and (2) one round of monitoring has been conducted during October 2014 to April 2015 wet season. Reporting results to the Regional Board will occur on or before December of 2015. By this time, it is expected that the County of Los Angeles will have developed a standardized annual report form that will include reporting criteria for the MS4 permit, TMDLs, MALs and certain water quality standards.

1.17 Monitoring Protocols

The MRP requires a variety of monitoring requirements that are governed by monitoring protocols established by USEPA, which are summarized below.

I. *Receiving Monitoring Protocol*

- Minimum required receiving water monitoring frequencies are defined in section VI.C of Attachment E in the MS4 Permit. Wet weather is defined as when the flow with the receiving water is at least 20%

greater than the base flow. As per San Gabriel River Metals and Impaired Tributaries Metals and Selenium TMDL, wet weather is defined in San Gabriel Reach 2 and all upstream reaches and tributaries of San Gabriel River Reach 2 as when maximum daily flow of the river is equal to or greater than 260 cubic feet per second (cfs) as measured at USGS 11085000, located at the bottom of Reach 3, just above the Whittier Narrows Dam. In an effort to simplify the wet weather definition, the City will utilize the definition in Attachment A of the MS4 Permit, which defines the wet season as the time period between October 1st and April 15th unless a storm event that is qualified to be targeted as the first event of the year is forecasted within a reasonable amount of time prior to October 1st.

- Wet weather monitoring will occur at least three times per year for all applicable parameters with the exception for aquatic toxicity. Aquatic toxicity monitoring will be conducted at a minimum of twice per year. The first wet weather event with a predicted rainfall of .25 inches and with a 70% probability 24 hours prior to rain fall will be targeted for monitoring. At a minimum two additional rainfall events with a minimum separation of three dry days (less than .1 inch of rain per day) between monitoring will be monitored to meet the minimum requirement of three storm events per year. Receiving water monitoring shall be coordinated to start as soon as possible following storm water outfall monitoring to better reflect the potential impact from MS4 discharges.
- Dry weather monitoring requirements are defined in section VI.D of Attachment E in the MS4 Permit. Dry weather is defined as when the flow is less than 20 percent, greater than the base flow. Monitoring shall take place a minimum of two times per year for all parameters, or more if required by a TMDL monitoring plan. At least one of the monitoring events shall take place during the historically driest month of

the year. Typically the driest month of the year is in August, which will be utilized for the time period of which at least one of the monitoring events occurs.

II. *Non-storm water outfall based sampling Protocol*

- Non-storm water discharges shall be monitored during days when precipitation is <0.1 inch and those days not less than 3 days aftera rain day unless an alternative criterion is provided for in an approved IMP. A rain day is defined as those with >=0.1 inch of rain.
- Flow weighted composite samples shall be taken for a non-storm water discharging using a continuous sampler. If city cannot install continues sampler then it shall be taken as a combination of a minimum of 3 sample aliquots, taken in each hour during a 24 hour period.

III. *Outfall Based sampling protocol*

For each field screening point, sample shall be collected of storm water discharge from three storm events occurring at least one month apart in accordance with the requirements indicated below:

- For storm water discharges shall be monitored a minimum of three times per year for all parameters except aquatic toxicity. Wet weather is defined as when the flow with the receiving water is at least 20% greater than the base flow. As per San Gabriel River Metals and Impaired Tributaries Metals and Selenium TMDL, wet weather is defined in San Gabriel Reach 2 and all upstream reaches and tributaries of San Gabriel River Reach 2 as when maximum daily flow of the river is equal to or greater than 260 cubic feet per second (cfs) as measured at USGS 11085000, located at the bottom of Reach 3, just above the Whittier Narrows Dam. The first wet weather event with a predicted rainfall of .25 inches and with a 70% probability 24 hours

prior to rain fall will be targeted for monitoring. At a minimum two additional rainfall events with a minimum separation of three dry days (less than .1 inch of rain per day) between monitoring will be monitored to meet the minimum requirement of three storm events per year.

- In addition, the City will target the first storm event of the storm year with a predicted rainfall of at least 0.25 inch with a 70% probability of at least 24 hours prior to the event start time. Another two wet weather samples will be taken when the predicted rain event is equal to or more than 0.1 inches and minimum 3 consecutive days of dry weather.
- Sampling of storm water from field screening points will take place during the first 24 hours of the storm water discharge or for the entire storm water discharge if it is less than 24 hours.

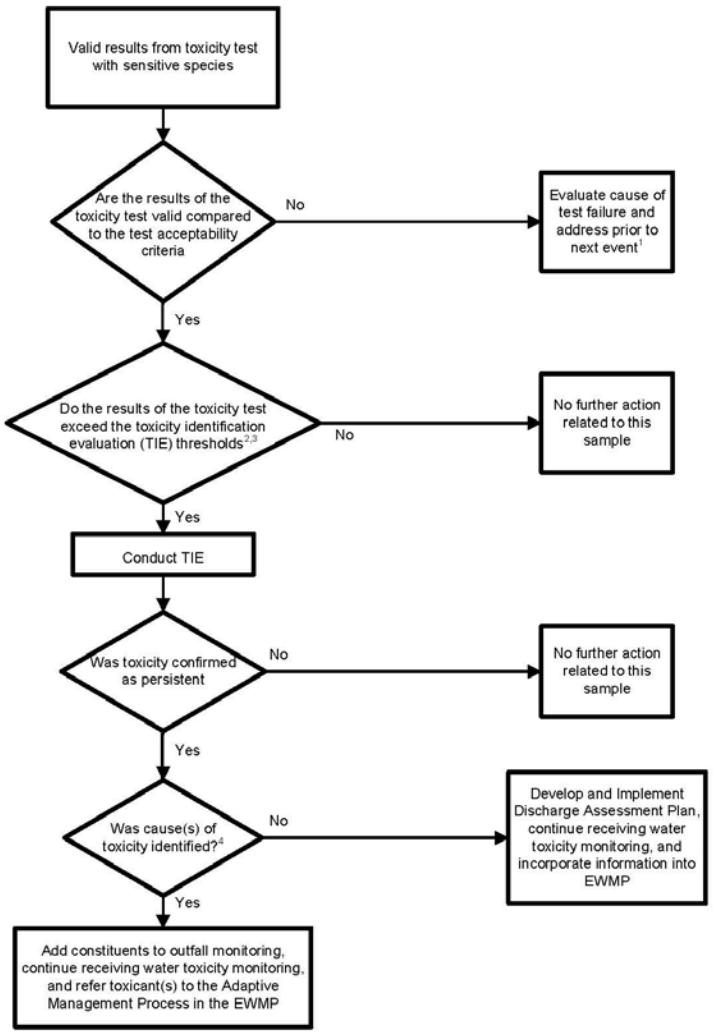
Table XII - Following parameter shall be monitored:

Receiving Water Monitoring	Outfall Based Monitoring	No-storm water Outfall Based Monitoring
Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS	Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS	Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS, Sulfate, Chloride
Table E-2 Pollutants	Table E-2 Pollutants	Table E-2 Pollutants
Copper, Lead, Zinc, Selenium	Copper, Lead, Zinc, Selenium	Copper, Lead, Zinc, Selenium
Aquatic Toxicity (twice per year wet weather, once per year for dry weather)	TIE Toxicity	-
Coliform Bacteria	Coliform Bacteria	Coliform Bacteria
Cyanide, Mercury	Cyanide, Mercury	Cyanide, Mercury

IV. Toxicity Monitoring/Testing Protocol

- The approach to conducting aquatic toxicity monitoring is presented in Figure C-1, which describes a general evaluation process for each

sample collected as part of routine sampling conducted twice per year in wet weather and once per year in dry weather. Monitoring begins in the receiving water and the information gained is used to identify constituents for monitoring at outfalls to support the identification of pollutants.



Footnotes

1. Test failure includes pathogen or epibont interference, which should be addressed prior to the next toxicity sampling event. Additionally, lab control organisms may fail to meet test standards. As a result of test failure, toxicity samples will be collected during the next wet weather event, or as soon as possible following notification of test failure for dry event samples.
2. For freshwater, the TIE threshold is equal to or greater than 50% (≥50%) mortality in an acute (wet weather) or chronic (dry weather) test. If a ≥50% effect in a sub-lethal endpoint for chronic test is observed during dry weather, a follow up sample will be collected within two weeks of the completion of the initial sample collection. If the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
3. For marine waters and estuarine waters, the TIE threshold is the percent effect value ≥50%. If a ≥50% or greater effect is observed during dry weather a follow up sample will be collected within two weeks of the initial sample collection and if the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
4. The goal of conducting Phase I TIEs is to identify the cause of toxicity so that outfall monitoring can incorporate the toxicant(s) into the list of constituents monitored during outfall monitoring. Thus, if specific toxicant(s) or the analytical class of toxicants (i.e., metals that are analyzed via EPA Method 200.8) are identified, sufficient information is available to inform the addition of pollutants to the list of pollutants monitored during outfall monitoring.

1.18 Implementation Schedule (Milestones)

The table below provides a schedule for implementing MRP/CIMP tasks.

Table XIII – Implementation Schedule

Task	Deadline Date
• Submit WMP, MRP, and CIMP to Regional Board	No later than June 28, 2014
• Using GIS mapping, provide land use overlay of City's storm drain system	No later than June 28, 2014
• Using GIS mapping, show City's storm drain system including catch basins and connections to receiving waters	No later than June 28, 2014
• Using GIS mapping, identify watersheds and sub-watersheds based on Los Angeles County's HUC 12 equivalent boundaries	No later than June 28, 2014
• Using GIS mapping identify groundwater recharge facilities into which City drains	No later than June 28, 2014
• Using GIS mapping, identify: stormwater outfalls and field screening points; mass emission and other in-stream monitoring points/stations; and ambient monitoring locations established by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP); and locations established by the Council for Watershed Health.	No later than June 28, 2014
• Conduct outfall monitoring for stormwater discharges for TMDLs, other water quality standards, MALs, and toxicity three times beginning during 2015-2016 wet season and annually thereafter.	Beginning no later than October of 2015
• During the dry season, conduct monthly non-stormwater visual observations and grab sampling if flow is detected.	No later than May 1, 2015
• If no data exists the City shall contract for the CWH to conduct ambient monitoring once during the term of the permit for Reach 2, Rio Hondo and Reach 3 of the San Gabriel River (costs to be shared with the cities of Irwindale and West Covina).	No later than June 28, 2015
• Review available ambient monitoring data and studies to assess the health of the San Gabriel River (reaches 2 and above) and Reach 2 of the Rio Hondo	No later than June 28, 2014
• Submit annual monitoring reports to the Regional Board of any available TMDL or other water quality standards data generated through outfall monitoring.	Beginning no later than December of 2014
• Submit new development/redevelopment track form.	No later than one month following the Regional Board's approval of the CIMP

END SECTION ONE

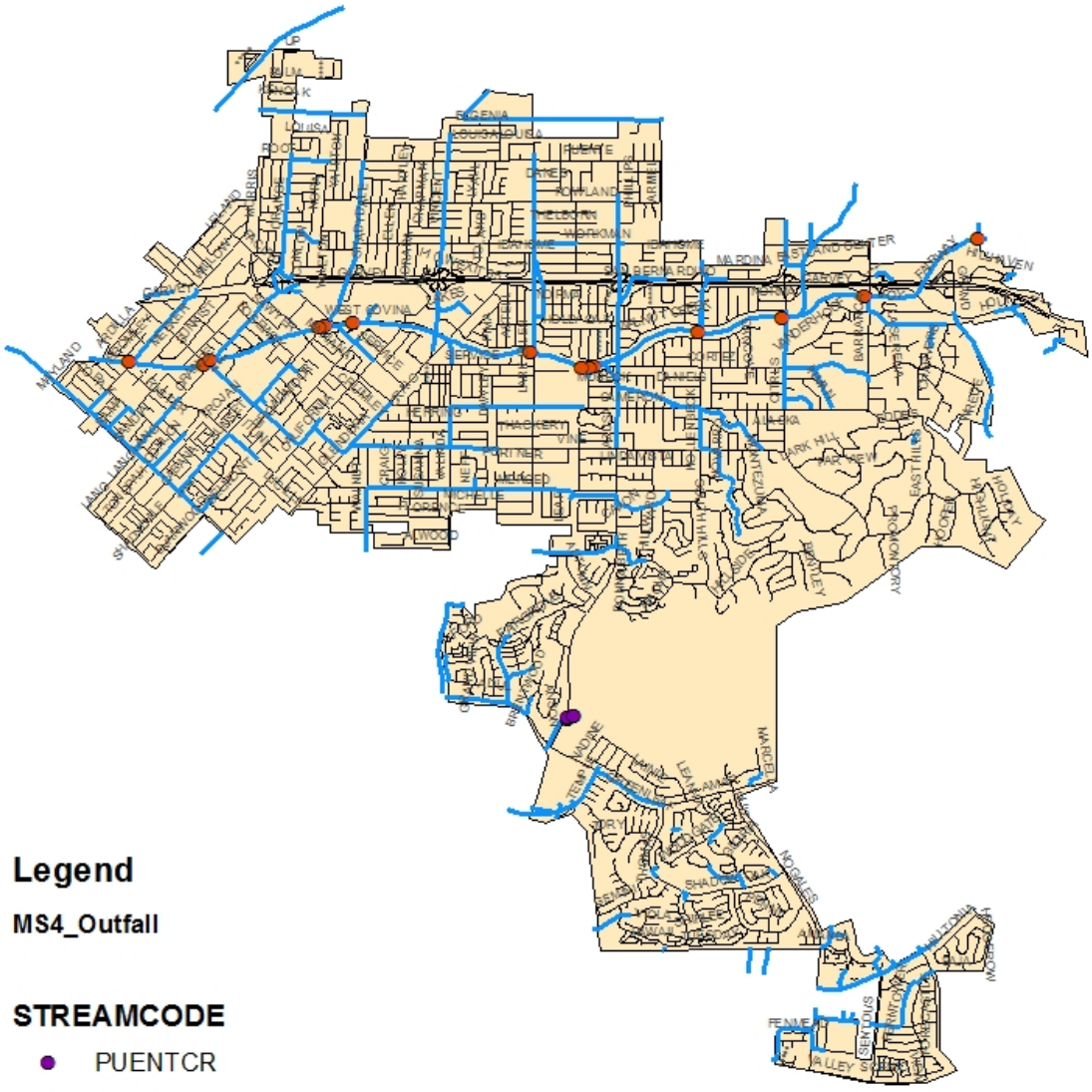
Appendix A

Maps

Appendix A-1

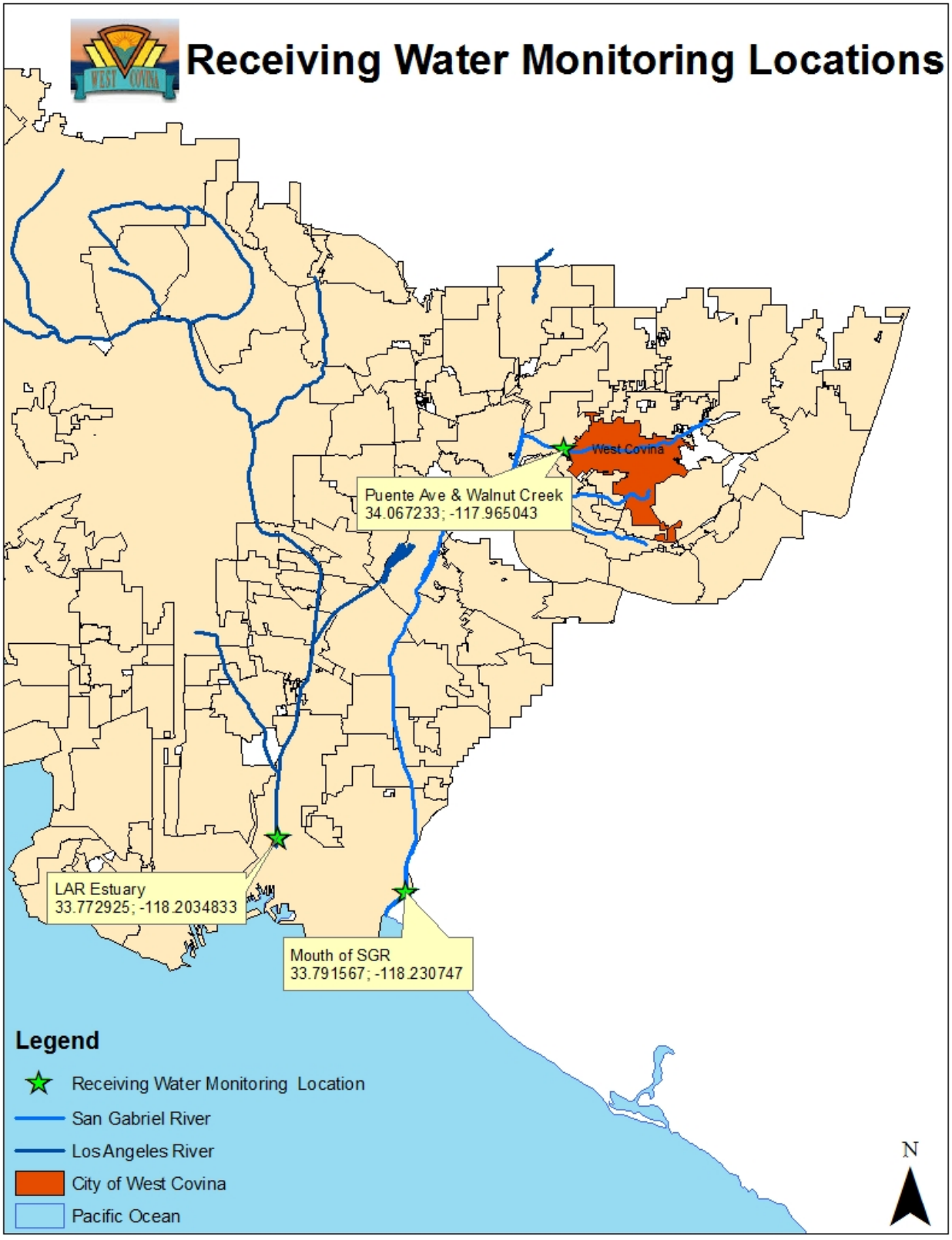
Outfall Location Map

City of West Covina Outfall



Appendix A-2

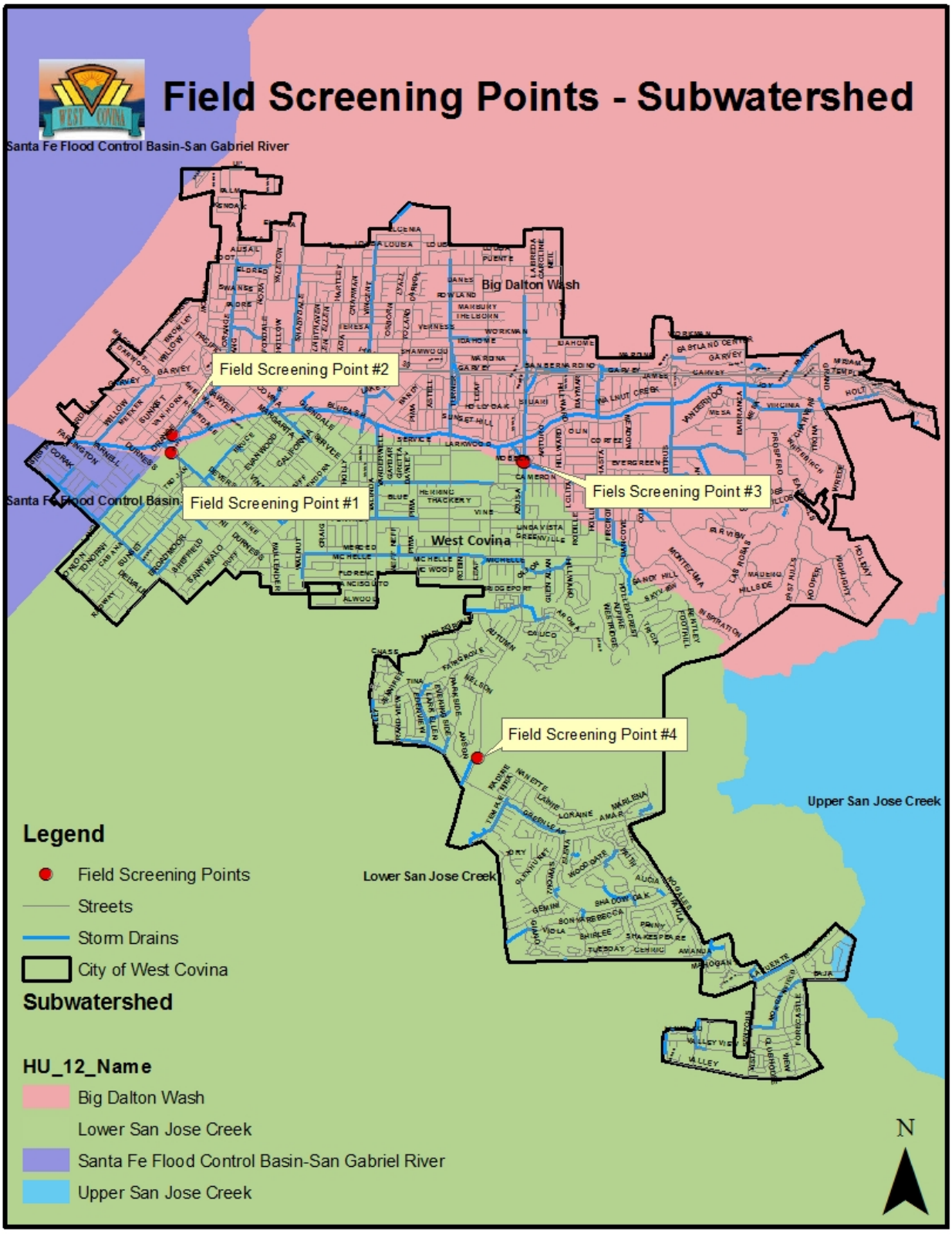
Receiving Water Location Map


Receiving Water Monitoring Locations
West Covina
Puente Ave & Walnut Creek
34.067233; -117.965043
LAR Estuary
33.772925; -118.2034833
Mouth of SGR
33.791567; -118.230747
Legend
Receiving Water Monitoring Location
San Gabriel River
Los Angeles River
City of West Covina
Pacific Ocean
N

Appendix A-3

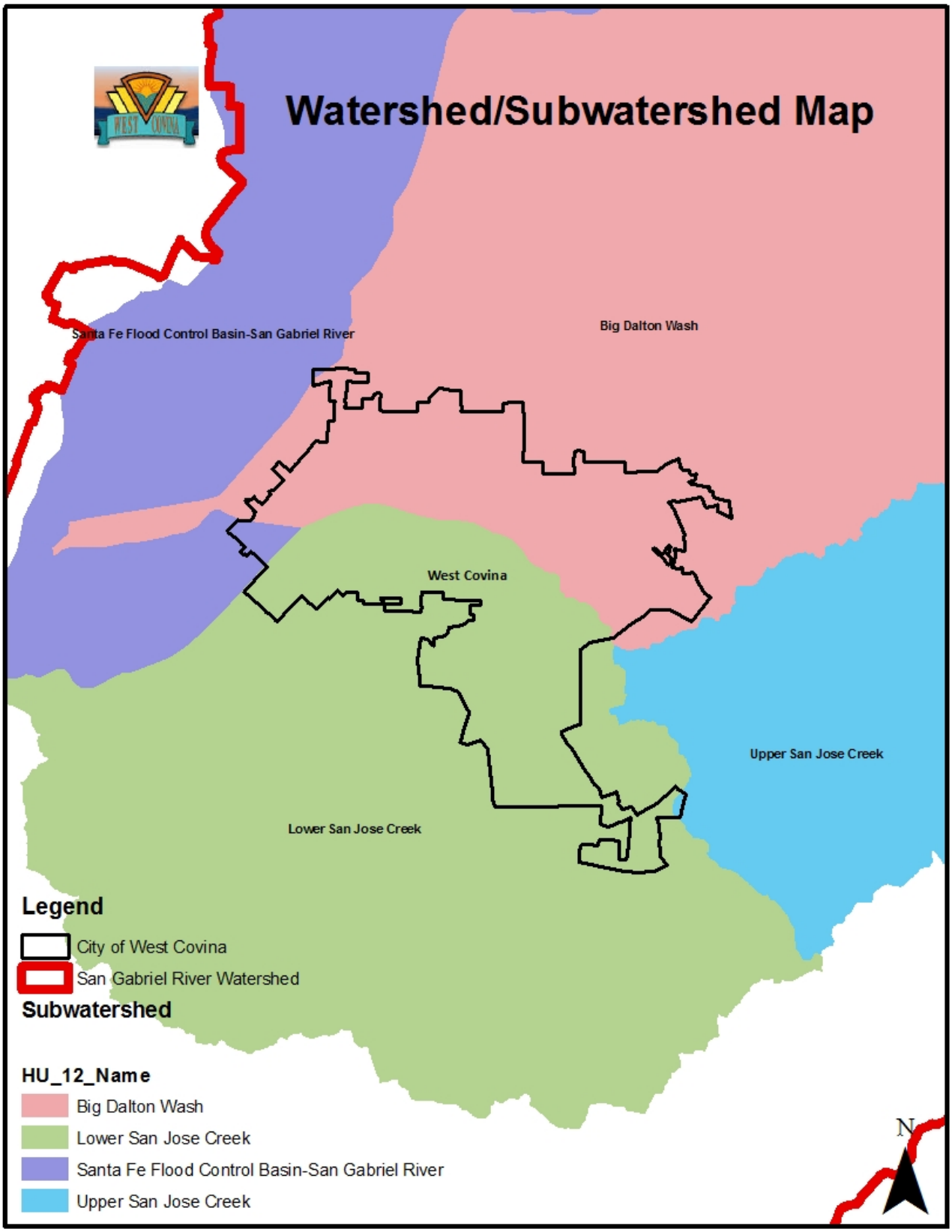
Field Screening Locations

HUC 12 sub watershed


Field Screening Points - Subwatershed
Santa Fe Flood Control Basin-San Gabriel River
Big Dalton Wash
Field Screening Point #2
Field Screening Point #1
Fiels Screening Point #3
Santa Fe Flood Control Basin
West Covina
Field Screening Point #4
Upper San Jose Creek
Lower San Jose Creek
Legend
Field Screening Points
Streets
Storm Drains
City of West Covina
Subwatershed
HU_12_Name
Big Dalton Wash
Lower San Jose Creek
Santa Fe Flood Control Basin-San Gabriel River
Upper San Jose Creek
N

Appendix A-4

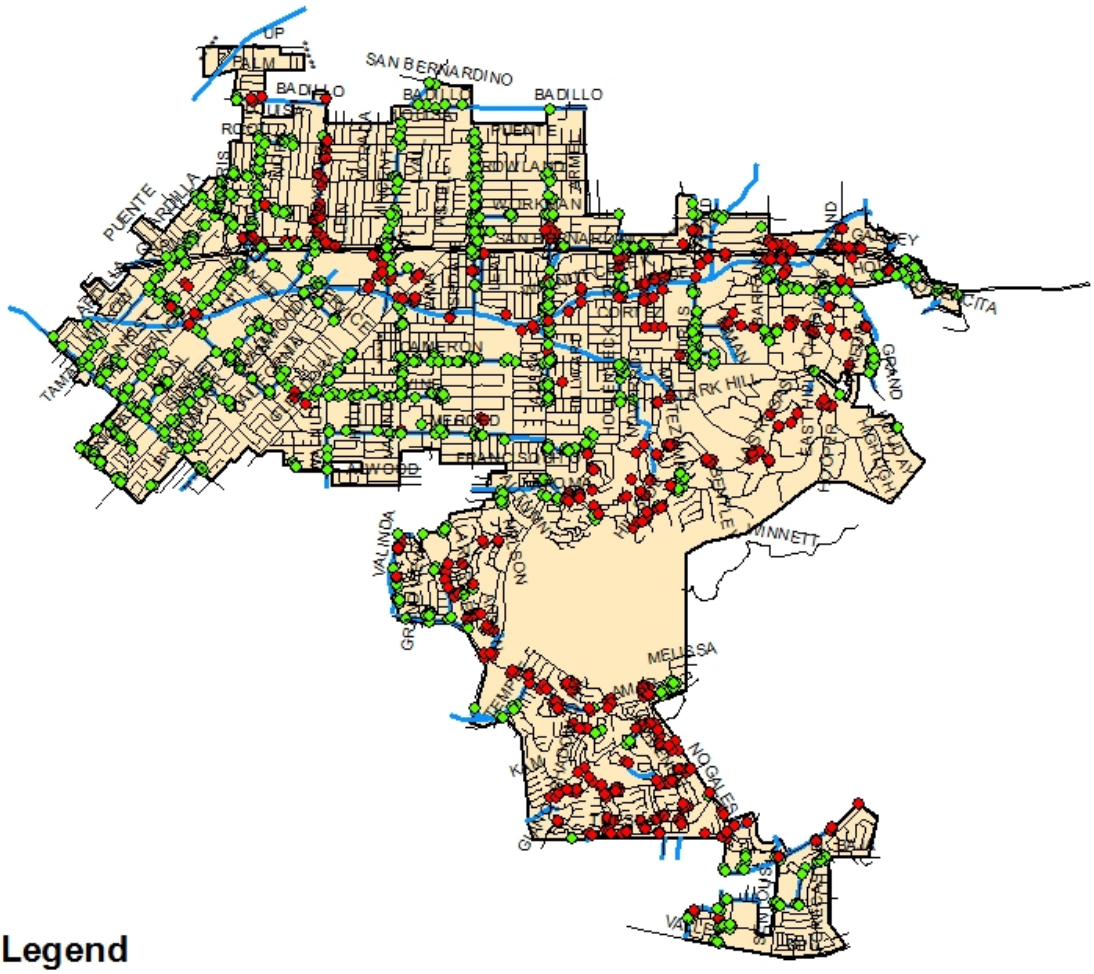
Watershed/Sub-watershed & City Boundary Map


Watershed/Subwatershed Map
Santa Fe Flood Control Basin-San Gabriel River
Big Dalton Wash
West Covina
Upper San Jose Creek
Lower San Jose Creek
Legend
City of West Covina
San Gabriel River Watershed
Subwatershed
HU_12_Name
Big Dalton Wash
Lower San Jose Creek
Santa Fe Flood Control Basin-San Gabriel River
Upper San Jose Creek
N

Appendix A-5

Storm Drain/Catch Basin Map

Catch Basins Map



Legend

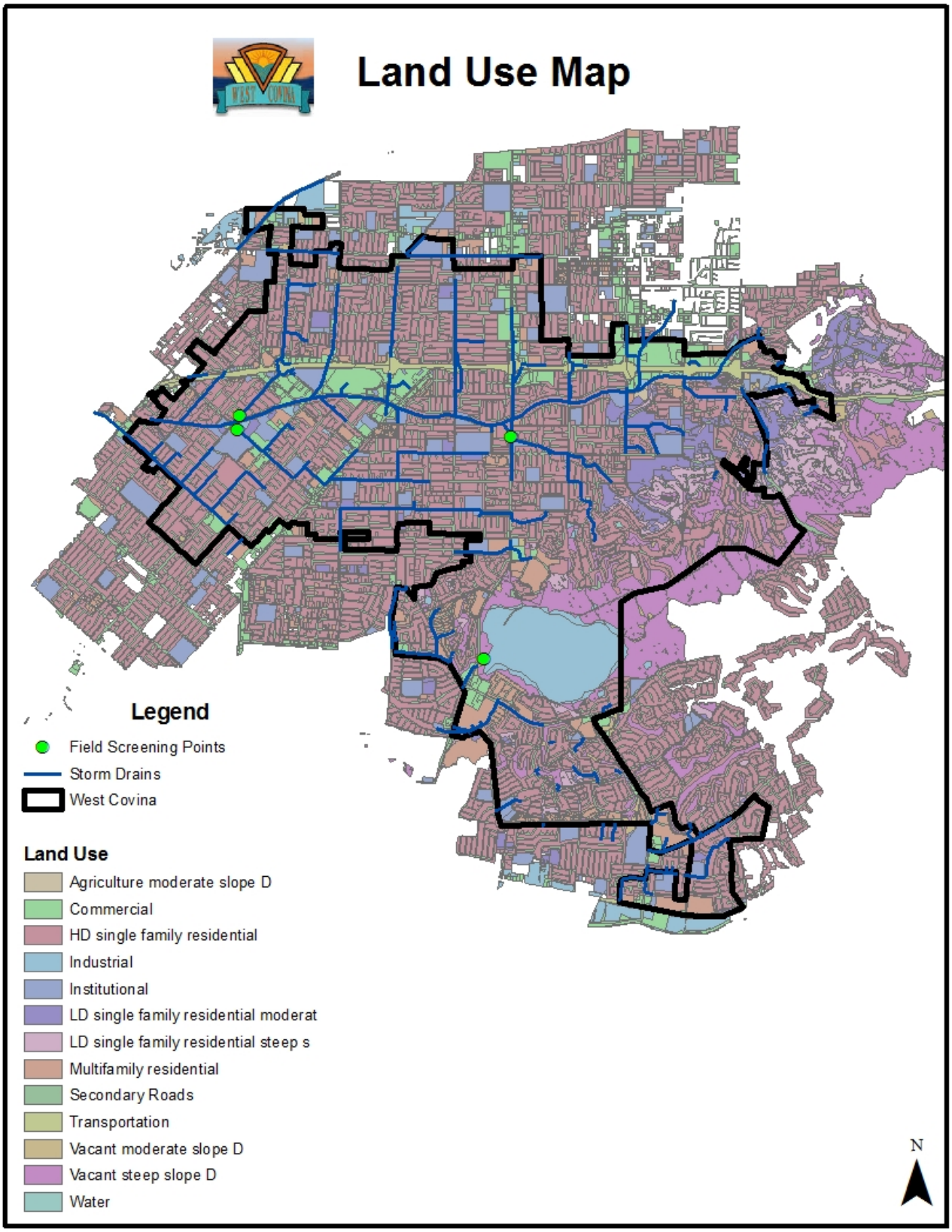
OWNERSHIP

- CITY
- LACFCD
- streets
- Storm Drain
- West Covina

Appendix A-6

City Land Use Map

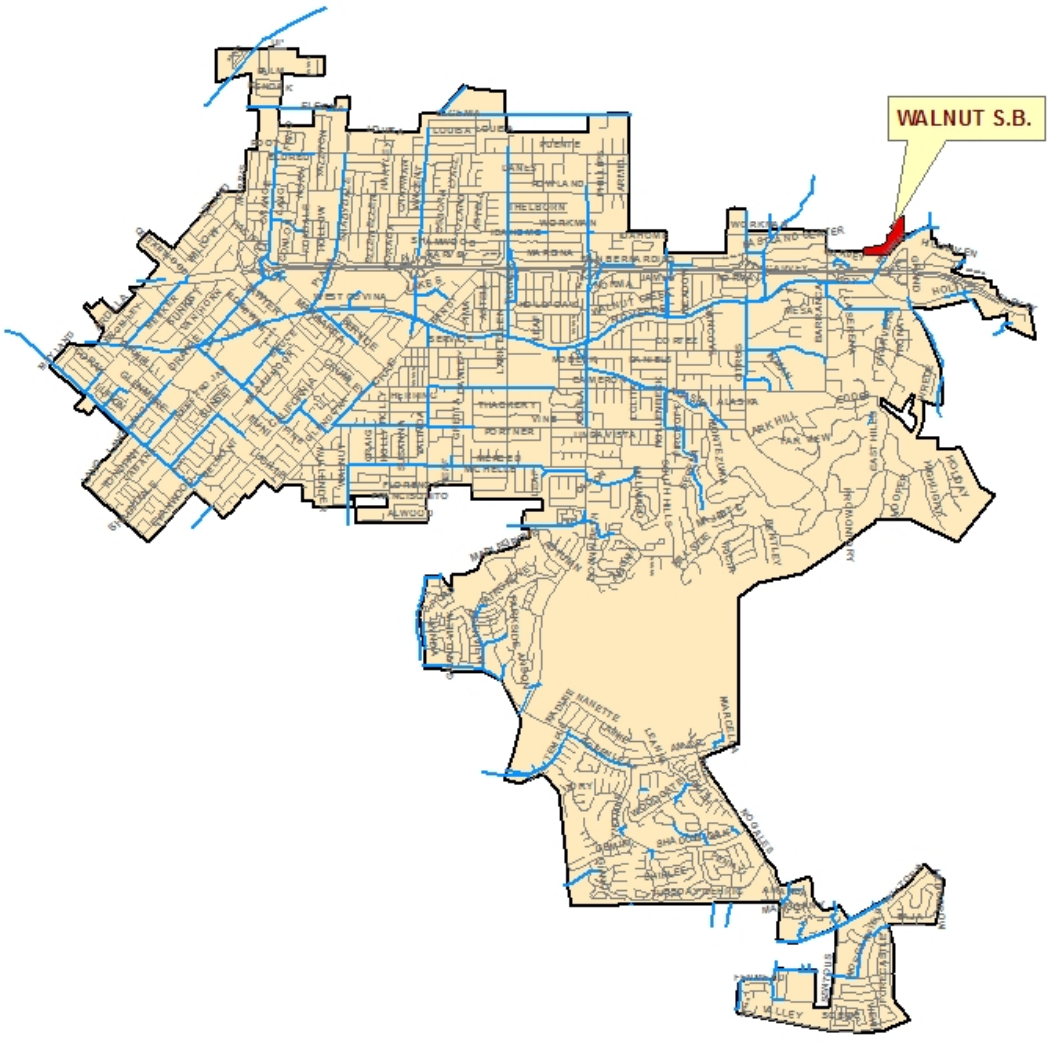
Land Use Map


Legend
Field Screening Points
Storm Drains
West Covina
Land Use
Agriculture moderate slope D
Commercial
HD single family residential
Industrial
Institutional
LD single family residential moderat
LD single family residential steep s
Multifamily residential
Secondary Roads
Transportation
Vacant moderate slope D
Vacant steep slope D
Water
N

Appendix A-7

Spreading Grounds Location Map

Spreading Ground (Basin)



Legend

- Spreading Grounds
- Storm Drains
- Streets
- West Covina

N

Appendix B

2010 303(d) List for San Gabriel Rivers and Tributaries

Appendix B

Table XIV – 303(d) List - San Gabriel River and Tributaries

2010 303 (d) List			
Reach	**Parameter**	**TMDL Status Date**	**Source**
San Jose Creek Reach 1 (SGR Confluence to Temple Street	Coliform Bacteria	2009	Unknown
	Toxicity	2019	Unknown
	TDS	2021	Unknown
	pH	2021	Unknown
	Ammonia	2019	Non-point and Point Source
Walnut Creek (Drains from Puddingstone Reservoir)	Indicator Bacteria	2021	Unknown
	Benthic-Macro inverte-brate Bioassessment	2012	Unknown
	pH	2007	Unknown